

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

James Douglas Wolfe,

Plaintiff,

v.

City of North Charleston; Jerry Jellico,  
individually and/or in his official capacity as  
an agent of the City of North Charleston;  
Jennifer Butler, individually and/or in his  
official capacity as an agent of the City of  
North Charleston; Charles Benton,  
individually and/or in his official capacity as  
an agent of the City of North Charleston,  
Robert E. Stone, individually and/or in his  
official capacity as an agent of the City of  
North Charleston;

Defendants.

No.: 2:19-cv-00902-BHH-BM

Declaration of Eric Laquiere

1. My name is Eric Laquiere. I am over the age of eighteen and competent to execute this declaration, which I make based on my own personal knowledge and recollection.
2. I was Plaintiff's trial counsel in the underlying criminal charges. I also was Plaintiff's counsel in this action prior to Mr. Luck.
3. I made the attached Motion for Disclosure and Production of Grand Jury Materials (Exhibit A) on January 30, 2018.
4. To the best of my recollection, Judge Markley Dennis stated that he would deny this motion on January 30, 2018 at a status conference held in his chambers. Judge Dennis did not issue a written order denying this motion.

EL

5. Because the Motion for Disclosure and Production of Grand Jury Materials cited law relating to the state grand jury (as opposed to county grand juries), I withdrew this motion after the January 30, 2018 status conference. (Exhibit B – 01/30/18 email; Exhibit C - withdrawal).
6. On February 1, 2018, I filed the attached Supplemental Rule 5 Request (Exhibit D). The State refused to provide these materials. I did not have the opportunity to file a motion to compel relating to this request; as this case was designated for trial on the week of February 12, 2018; although the trial was not actually convened until March 19, 2018 due to court administration issues.
7. I have reviewed ECF Entry 63-2, and it is a true and accurate copy of Plaintiff's August 2016 indictments. I have attached to this declaration a true and accurate copy of Plaintiff's November 2017 indictment as Exhibit E.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 6/25/20

  
Eric Laquiere

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

STATE OF SOUTH CAROLINA

Plaintiff,

vs.

JAMES DOUGLAS WOLFE

Defendant.


) IN THE COURT OF GENERAL SESSIONS  
) FOR THE NINTH JUDICIAL CIRCUIT

) CASE NO.: 2016A1010201318; 2016A102100298;  
) & 2017GS1007405

**MOTION FOR DISCLOSURE AND  
PRODUCTION OF GRAND JURY  
MATERIALS**

The Defendant, by and through his undersigned attorney, moves this Court pursuant to the Supreme Court of South Carolina's ruling in Evans v State 464 S.C. 495 (2005) and other applicable law that this Court Order disclosure and production of all petitions and materials presented to the grand jury, including but not limited to affidavits, audio recordings, and transcripts of testimony with respect to each of the three indictments of James Wolfe. Additionally, the Defense requests that the Court Order disclosure of the judge's order impaneling the grand jury which indicted him as well as the impanelment and supporting documents sufficient to verify that the impanelment complied with SC Code 14-7-1630..

Laquiere Law, Inc.

  
Eric B. Laquiere

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888-745-8449 fax

[eric@laqlaw.com](mailto:eric@laqlaw.com)

Attorney for the Defendant, James Wolfe

Charleston, South Carolina

January 30, 2018

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

STATE OF SOUTH CAROLINA

Plaintiff,

vs.

JAMES DOUGLAS WOLFE

Defendant.

) IN THE COURT OF GENERAL SESSIONS  
) FOR THE NINTH JUDICIAL CIRCUIT  
)

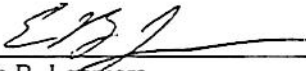
) CASE NO.: 2016A1010201318;  
) 2016A1021000298; & 2017GS1007405  
)

**NOTICE OF INTENT TO WITHDRAW**

**MOTION FOR DISCLOSURE AND  
PRODUCTION OF GRAND JURY  
MATERIALS**

The Defendant, by and through his undersigned attorney, withdraws the motion entitled "Motion for Disclosure and Production of Grand Jury Materials". This motion is in error and cites incorrect legal authority. Please note for the record that the Defense withdraws this motion.

Laquiere Law, Inc.

  
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Attorney for the Defendant, James Wolfe

Charleston, South Carolina  
January 31, 2018

FILED  
2018 FEB -1 PM 4:19  
CLERK OF COURT  
BY

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

STATE OF SOUTH CAROLINA

vs.

JAMES DOUGLAS WOLFE

Defendant.

) IN THE COURT OF GENERAL SESSIONS  
) FOR THE NINTH JUDICIAL CIRCUIT  
)


) CASE NO.: 2016A1010201318;  
) 2016A1021000298; & 2017GS1007405  
)

**SUPPLEMENTAL RULE 5 REQUEST**

The Defendant, by and through his undersigned attorney, requests pursuant to Rule 5 SCRCrimP and the Supreme Court of South Carolina's ruling in *Evans v State* 464 S.C. 495 (2005) that the State produce to the Defense all information relating to the impanelment of the county grand jury which indicted him in 2016 and the county grand jury which indicted him in 2017, as well as supporting documents sufficient to verify that the impanelment complied with SC Code 14-7-1510 et seq. and other requirements of the law of this State.

The Defense requests all information which exists regarding the two grand juries who indicted the Defendant including but not limited to information on creation of the original pool from which the grand juries were selected, the method of selection, the persons selected (including their race, sex, address within the county if available), and their impanelment.

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Attorney for the Defendant, James Wolfe

Charleston, South Carolina  
January 31, 2018

FILED  
2018 FEB -1 PM 4:19  
CLERK OF COURT



STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

INDICTMENT

At a Court of General Sessions, convened November 2017, the Grand Jurors of Charleston County present upon their oath:

UNLAWFUL CONDUCT TOWARDS A CHILD

That in Charleston County, South Carolina, between January 26, 2016, and March 23 2016 the Defendant, James Douglas Wolfe, while having charge or custody, or being the parent or guardian, or being responsible for the welfare of the minor child, E [REDACTED] W [REDACTED] did (1) unlawfully place the minor victim at unreasonable risk of harm affecting the child's life, physical or mental health or safety; or (2) unlawfully and maliciously do, or cause to be done, bodily harm to the child so that the life or the health of the child was endangered or likely to be endangered. This is in violation of Section 63-5-70, Code of Laws of South Carolina (1976) as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.

  
DEBORAH HERRING-LASH  
ASSISTANT SOLICITOR

DHL/0315608  
WITNESSES

North Charleston Police Department

AGENCY CASE NUMBER

2016-008723

ARREST WARRANT NUMBER

2017-GS-10-07405

DATE OF ARREST

03/23/2016

ACTION OF GRAND JURY  
**TRUE BILL**

Forfeiture of Grand Jury

NOV 07 2017

VERDICT

Foreperson of Petit Jury

Date:

DOCKET NO. 2017-GS-10-07405

The State of South Carolina

County of Charleston

COURT OF GENERAL SESSIONS

NOVEMBER TERM 2017

THE STATE

VS.

JAMES DOUGLAS WOLFE  
W/M DOB: [REDACTED] 1990

Indictment for

UNLAWFUL CONDUCT TOWARDS A  
CHILD

SC Code: § 63-05-0070  
CDR Code: 2481

**FILED**

11/8/2017 3:03:50 PM  
JULIE J. ARMSTRONG  
CLERK OF COURT

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

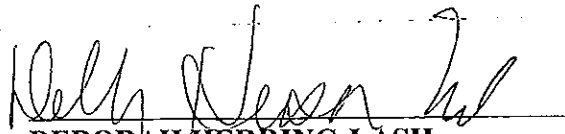
INDICTMENT

At a Court of General Sessions, convened August 2016, the Grand Jurors of Charleston County present upon their oath:

**UNLAWFUL CONDUCT TOWARDS A CHILD**

That in Charleston County, South Carolina, between January 26, 2016 and March 23, 2016, the Defendant, James Douglas Wolfe, while having charge or custody, or being the parent or guardian, or being responsible for the welfare of the minor child, E [REDACTED] W [REDACTED] did (1) unlawfully place the minor victim at unreasonable risk of harm affecting the child's life, physical or mental health or safety; and or (2) unlawfully and maliciously do, or cause to be done, bodily harm to the child so that the life or the health of the child was endangered or likely to be endangered. This is in violation of Section 63-5-70, Code of Laws of South Carolina (1976) as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.

  
DEBORAH HERRING-LASH  
ASSISTANT SOLICITOR



DHL/0315608  
WITNESSES

North Charleston Police Department

AGENCY CASE NUMBER

2016-008723

ARREST WARRANT NUMBER

2016A1010201318

DATE OF ARREST

03/23/2016

ACTION OF GRAND JURY

TRUE BILL

*Chas. J. [Signature]* AUG 09 2016  
Foreperson of Grand Jury Date:

VERDICT

Foreperson of Petit Jury

Date:

DOCKET NO. 2016-GS-10-04841

The State of South Carolina

County of Charleston

COURT OF GENERAL SESSIONS

AUGUST TERM 2016

THE STATE

VS.

JAMES DOUGLAS WOLFE

W/M DOB: [REDACTED]

Indictment for

UNLAWFUL CONDUCT TOWARDS A  
CHILD

SC Code: § 63-05-0070

CDR Code: 2481

FILED

8/17/2016 9:22:11 AM

JULIE J. ARMSTRONG

CLERK OF COURT

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

INDICTMENT

At a Court of General Sessions, convened August 2016, the Grand Jurors of Charleston County present upon their oath:

**INFLECTING GREAT BODILY INJURY UPON A CHILD**

That in Charleston County, between January 26, 2016 and March 23, 2016 the Defendant, James Douglas Wolfe, did inflict great bodily injury upon E [REDACTED] W [REDACTED] a child under the age of eighteen (18) years, in violation of Section 16-3-95(A) of the South Carolina Code of Laws (1976) as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.

  
DEBORAH HERRING-LASH  
ASSISTANT SOLICITOR

DHL/0315608  
WITNESSES

North Charleston Police Department

AGENCY CASE NUMBER

2016-008723

ARREST WARRANT NUMBER

2016A1021000298

DATE OF ARREST

03/23/2016

ACTION OF GRAND JURY

TRUE BILL

*Cheryl J. Go* AUG 09 2016  
Foreperson of Grand Jury Date:

VERDICT

Foreperson of Petit Jury

Date:

DOCKET NO. 2016-GS-10-04842

The State of South Carolina

County of Charleston

COURT OF GENERAL SESSIONS

AUGUST TERM 2016

THE STATE

VS.

JAMES DOUGLAS WOLFE

W/M DOB: [REDACTED]

Indictment for

INFLECTING GREAT BODILY INJURY  
UPON A CHILD

SC Code: § 16-03-0095(A)

CDR Code: 2766

FILED

8/17/2016 9:22:11 AM

JULIE J. ARMSTRONG

CLERK OF COURT